

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)
) MB Docket Number 04-
233
Proposed Broadcast Localism Requirements)
)

COMMENTS

Two Ocean Broadcasting Company (“Two Ocean”), the permittee of Station KJWY TV, Jackson, Wyoming, submits these comments in response to the above-mentioned rulemaking proceeding.

KJWY has a genuine concern in response to some of the proposals that the Commission has laid out in this rulemaking.

CONTINUOUSLY ATTENDED OPERATION

KJWY TV is concerned with the requirement of staffing the station continuously. This would impose a large burden on KJWY TV. Due to the low population in the area, advertising and network revenue are low, such that the costs to staff a 24/7 operation would become the vast majority of the operating budget. It would force KJWY TV to re-locate or cease operations. Clearly, this would not be in the public interest, as a cessation of operation would result in the termination of off-the air reception of NBC affiliate programming in a very rural area.

KJWY TV can not afford to employ additional personnel to duplicate the same functions that the Emergency Alert System (“EAS”) already provides the station. The advances made in technology over the past thirty years: the integration of automation and EAS unit has made it possible to provide the public with pertinent emergency information every hour of the day.

COMMUNITY ADVISORY BOARDS

KJWY TV maintains a strong commitment to community and believes that a permanent advisory board would not be feasible for such a small station due to the man hours and cost it would impose.

KJWY TV currently serves the community and does not see the need for further federally mandated rules and regulations:

- Community Calendar: one minute segment featuring upcoming community events. It runs from 6:00 a.m. to 12:00 midnight, eight times per day, seven days a week.
- Five Day Forecast: during morning hours, 7:00 a.m. to 10:00 a.m., report current weather conditions at least four times throughout the morning.
- Ski Reports: during morning hours, 7:00 a.m. to 9:00 a.m., report current ski conditions for the area at least four times throughout the morning.
- Avalanche Report: during the morning hours, 7:00 a.m. to 9:00 a.m., report the current avalanche conditions in the backcountry at least two times throughout the morning.
- Pet of the Week: Monday through Sunday, approximately eight times throughout the day, KJWY features a pet of the week from the local animal shelter.
- Historical Moments: community outreach; KJWY oversees production of a glimpse into the areas past. KJWY and students from the community produce a one-minute historical moment that airs eight times per day, seven days a week
- Local Public Service Announcements: throughout the year KJWY, at no charge, produces and airs each announcement, Monday – Sunday, approximately eight time a day; currently airing:

~ Community events, Annual Town Square Egg Hunt.

~ Local Benefits: Knights of Columbus, Rotary Club, Lions Club,

Kiwanis..

- ~ Fire Department, Adopt a fire Hydrant.
- ~ WYDOT, Local road safety tips.
- ~ Teton County Search & Rescue, Avalanche safety tips.
- ~ Red Cross, blood drive dates and times, benefits to raise local funds.

The above are some of the examples of how KJWY TV is committed every day of the year to ensure that the community is actively involved in and represented by our station.

CONCLUSION

In opposition of additional rules and regulations, KJWY respectfully requests the Commission take into consideration the comments stated above.

Respectfully submitted,

Christel Rahme
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